

EXHIBIT F

Keith Patterson

June 28, 2005

Philadelphia, PA

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MASSACHUSETTS

VOLUME I

- - -
IN RE: PHARMACEUTICAL : MDL NO. 1456
INDUSTRY AVERAGE WHOLESALE : MASTER FILE NO.
PRICE LITIGATION : 01CV12257-PBS
- - -

CERTIFIED COPY

Videotaped deposition of KEITH
PATTERSON was taken, pursuant to notice, at
SPECTOR, ROSEMAN & KODROFF, P.C., 1818 Market
Street, 25th Floor, Philadelphia, Pennsylvania on
Tuesday June 28, 2005, beginning at 9:19 a.m.,
before M. Kathleen Muino, Professional Shorthand
Reporter, Notary Public, and Robert Blum,
Videographer, there being present:

- - -

Henderson Legal Services
(202) 220-4158

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1 encouraging the formation of buy groups to take
2 advantage of volume discounts?

3 MR. SCHEFF: Object to the form.

4 THE WITNESS: No.

5 BY MR. WEXLER:

6 Q. Do you know who Chris Bowman (ph) is?

7 A. I recognize the name.

8 Q. Do you recognize what NSS stands for?

9 A. Yes.

10 Q. What is that?

11 A. National Specialty Services.

12 Q. What was the relationship between Zeneca
13 and National Specialty Services?

14 A. They served as our distributor of Zoladex
15 to the -- to the physicians.

16 Q. Do you recall the sales force -- members
17 of the sales force using -- giving samples to
18 physicians for which they could bill Medicare the
19 full AWP?

20 A. Absolutely not.

21 Q. You never heard of that happening?

22 A. Not at Zeneca.

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1 A. In much detail, no, other than it was --
2 we would put numbers forward, attempt to justify
3 them by if you want more money, you have to commit
4 to more sales, very simply.

5 Q. And when you say it was a negotiation
6 process between us and our management, who --

7 A. Uh-huh.

8 Q. -- are you referring to?

9 A. I -- I -- I would go through my immediate
10 supervisor, and in turn, they would have to go
11 through their immediate supervisor, up -- up the
12 chain of command. How far...

13 Q. In addition to discounts, did Zeneca use
14 other methods of increasing the spread between AWP
15 and actual acquisition costs for Zoladex during
16 the period that you were with Zeneca?

17 A. I don't --

18 MR. SCHEFF: Object to the form.

19 THE WITNESS: No.

20 BY MR. WEXLER:

21 Q. You don't recall any contract strategies
22 that were put into effect?

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